



Nebraska Public Power District

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August 31, 2010

W. Clark Smith
NDEQ Air Quality Division
1200 N Street Atrium, Suite 400
Lincoln, Nebraska 68509-8922

Subject: Mobile Generator Initial Notification Form

Dear Mr. Smith:

Enclosed is the initial notification form as required in 40 CFR Part 63, Subpart ZZZZ for three (3) mobile emergency compression ignition reciprocating internal combustion engine (RICE) located at Nebraska Public Power District's (NPPD) York Operations Center. It is NPPD's interpretation that these engines meet the definition of a mobile engine and therefore are not subject to 40 CFR Part 63, Subpart ZZZZ. RICE is defined in the rule as "any reciprocating internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile."

However, based on conversations with you on August 30, 2010 it is the NDEQ's interpretation that these engines are classified as temporary stationary sources for purposes of permitting the engines under Title 129 and are therefore subject to 40 CFR Part 63, Subpart ZZZZ. As a result of this interpretation and recommendations from the NDEQ, NPPD, out of an abundance of caution, is submitting the initial notification for these engines.

NPPD believes that these engines can qualify as mobile engines and requiring NPPD to submit the initial notification form may subject the engines to 40 CFR Part 63, Subpart ZZZZ. Therefore, NPPD requests that NDEQ issue new guidance and/or regulations that would permit these engines to be subject to the Title 129 permitting requirements but be exempt from the stationary engine requirements in 40 CFR Part 63, Subpart ZZZZ. If you have any questions regarding the notification please contact me at 402-563-5355.

Sincerely,

Joe L. Citta, Jr.
Corporate Environmental Manager

Cc: Region VII EPA – Air & Waste Management
Mike Linder – Director NDEQ
Jay Ringenberg – Deputy Director NDEQ
Shelley Schneider – Air Quality Division Administrator



NEBRASKA DEPARTMENT OF ENVIRONMENTAL QUALITY
Air Quality Division

INITIAL NOTIFICATION FORM

Applicable Rule: 40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE) - Promulgated 6/15/04, 1/18/08, & 3/3/10

Company Name York Operations Center

Facility ID# 62420, 62038, 62421

Owner/Operator/Title Nebraska Public Power District

Mailing Address PO Box 499

City Columbus

Zip 68602

Plant Address (if different than owner/operator's mailing address):

Street 907 West 25th Street

City York

Zip 68467

Plant Phone Number 402-362-7205

Plant Contact/Title Jeff Raymond, Environmental Coordinator

This form must be completed, signed and submitted to the following agencies:

NDEQ Air Quality Division
1200 'N' St. Atrium, Suite 400
Lincoln, NE 68509-8922

and

Region VII EPA – Air & Waste Management
901 N. 5th Street
Kansas City, KS 66101-2907

If your facility is located in Omaha or Lancaster County, you must submit a notification to the appropriate air pollution control agency in that area and Region VII EPA.

Provide the following information for the applicable stationary engine(s). Add additional tables or rows as needed.

Unit #	Engine Startup Date	Site Rating Brake Horsepower	Displacement (liters/cylinder)	Fuel(s) Combusted	Compression Ignition	Spark Ignition	Emergency	Limited Use
1	11/1992	745	1.5	Diesel	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> 4-Stroke <input type="checkbox"/> 2-Stroke <input type="checkbox"/> Lean Burn <input type="checkbox"/> Rich Burn	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> YES
2	04/1982	1,490	2.4	Diesel	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> 4-Stroke <input type="checkbox"/> 2-Stroke <input type="checkbox"/> Lean Burn <input type="checkbox"/> Rich Burn	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> YES
3	11/1996	2,145	2.4	Diesel	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> 4-Stroke <input type="checkbox"/> 2-Stroke <input type="checkbox"/> Lean Burn <input type="checkbox"/> Rich Burn	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> YES

Unit #	Engine Startup Date	Site Rating Brake Horsepower	Displacement (liters/cylinder)	Fuel(s) Combusted	Compression Ignition	Spark Ignition	Emergency	Limited Use
					<input type="checkbox"/> YES	<input type="checkbox"/> 4-Stroke <input type="checkbox"/> 2-Stroke <input type="checkbox"/> Lean Burn <input type="checkbox"/> Rich Burn	<input type="checkbox"/> YES	<input type="checkbox"/> YES
					<input type="checkbox"/> YES	<input type="checkbox"/> 4-Stroke <input type="checkbox"/> 2-Stroke <input type="checkbox"/> Lean Burn <input type="checkbox"/> Rich Burn	<input type="checkbox"/> YES	<input type="checkbox"/> YES
					<input type="checkbox"/> YES	<input type="checkbox"/> 4-Stroke <input type="checkbox"/> 2-Stroke <input type="checkbox"/> Lean Burn <input type="checkbox"/> Rich Burn	<input type="checkbox"/> YES	<input type="checkbox"/> YES

Source Classification - Check the box that applies:

- ☐ Facility is a major source of hazardous air pollutants (HAPs).*
☒ Facility is an area source of HAPs.*

**Note: A major source is a facility that has a potential to emit greater than 10 tons per year of any single HAP or 25 tons per year of all HAPs combined. All other sources are area sources. The major/area source determination is based on all HAP emission points inside the facility fence line.*

Is the engine(s) a new/reconstructed emergency or limited use engine and > 500 horsepower located at a major source of HAP ? ☐ Yes ☒ No

If YES, the engine(s) does not have any additional requirements under Subpart ZZZZ, but you must meet the requirements of 40 CFR Part 60 New Source Performance Standards Subpart IIII for Compression Ignition Engines or Subpart JJJJ for Spark Ignition Engines .

Source Type - Check the box that applies:

- ☐ New Source*
☒ Existing source*

**Note: To determine if you are a new or existing source, see the attached information following this form.*

Print or type the name and title of the Responsible Official for the facility:

Name: Patrick L. Pope

Title: Vice President and Chief Operating Officer

A Responsible Official can be:

- The president, vice president, secretary, or treasurer of the company that owns the plant;
- An owner of the plant;
- A plant engineer or supervisor of the plant;
- A government official, if the plant is owned by the Federal, State, City, or County government; or
- A ranking military officer, if the plant is located at a military base.

I CERTIFY THAT INFORMATION CONTAINED IN THIS REPORT IS ACCURATE AND TRUE TO THE BEST OF MY KNOWLEDGE.


 (Signature of Responsible Official)

8/31/10
 (Date)